

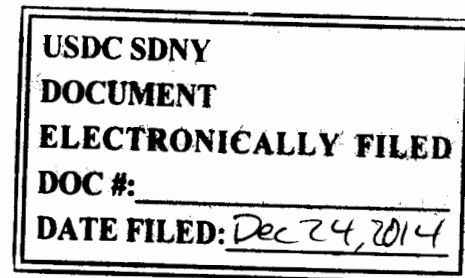
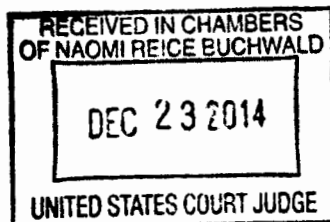
**KIRBY McINERNEY LLP**

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December 23, 2014

**BY ECF AND FAX**

Honorable Naomi Reice Buchwald  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312



Re: *In re LIBOR-Based Financial Instruments Antitrust Litig.*,  
No. 11 Civ. 2613 (NRB), Master File No. 1:11-md-2262-NRB

Dear Judge Buchwald:

We represent the Exchange-Based Plaintiffs ("Plaintiffs") in the above-referenced matter. We respectfully request an extension from January 2, 2015 until January 16, 2015 to submit the plan of notice, form of notice and summary notice related to the settlement with Barclays, as directed by Your Honor's December 2, 2014 Memorandum and Order (the "Order"). ECF No. 861. No previous request has been made for an adjournment of this deadline.

Your Honor's Order directed that Plaintiffs provide this information related to the settlement with Barclays within 30 days.

Plaintiffs have been working diligently to respond to the Order. Among the steps taken, Plaintiffs have:

- Obtained final cooperation from Barclays pursuant to the settlement agreement.
- Obtained bids from claims administrators and are in the process of selecting one.
- Developed a plan of notice (including direct notice) that may include obtaining detailed information from the Chicago Mercantile Exchange.
- Retained and started work with the Honorable Judge Nancy Gertner (Ret.), formerly of the District of Massachusetts, who will advise Plaintiffs' counsel on ways to construct a process for fair allocation of the settlement proceeds among the class members.

NEW YORK

CALIFORNIA

Application granted.  
Naomi Reice Buchwald,  
USDC  
12/23/14

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**Kirby McInerney LLP**

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- Worked with economists to construct a model to allocate damages across Eurodollar futures contracts and time periods.

Many of the professionals mentioned above (and counsel as well) have constrained availability during the holiday season, including and up to January 5, 2015. For this reason, Plaintiffs respectfully request this extension. Counsel for Barclays consents to this request and the other Defendants, through Defendants' Liaison Counsel, take no position. The extension requested herein does not affect any other scheduled dates.

Thank you very much.

Respectfully submitted,

/s/ Christopher Lovell  
Christopher Lovell  
LOVELL STEWART HALEBIAN  
JACOBSON LLP

/s/ David E. Kovel  
David E. Kovel  
KIRBY McINERNEY LLP

*Interim Co-Lead Counsel for Exchange-Based Plaintiffs and the Proposed Class*

cc: All Counsel of Record (by Electronic Filing)